IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ADAM STARKE, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. GILT GROUPE, INC., Defendant.	Case No. 1:13-CV-05497-LLS Hon. Louis L. Stanton

DECLARATION IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS

I, Shaina Stahl, declare as follows:

1. I am an associate with the law firm of Morgan, Lewis & Bockius LLP, attorneys for Defendant Gilt Groupe, Inc. ("Gilt"). I am admitted to practice in New York. I submit this declaration in support of Gilt's Motion to Dismiss.

2. Attached hereto as Exhibit "A" is a true and correct copy of the member registration screen on Gilt's website.

3. Attached hereto as Exhibit "B" is a true and correct copy of Gilt's Terms of Membership.

4. Attached hereto as Exhibit "C" is a true and correct copy of Gilt's Website Terms of Use.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
March 4, 2014

MORGAN, LEWIS & BOCKIUS LLP

_*/s/ Shaina Stahl*______
Shaina Stahl